

Mark C. Choate, AK #8011070
CHOATE LAW FIRM LLC
424 N. Franklin Street
Juneau, Alaska 99801
Telephone: (907) 586-4490
Facsimile: (206) 424-9705
Email: lawyers@choatelawfirm.com

Amanda J. Harber, AK #1011119
P.O. Box 661
Soldotna, AK 99669
Tel: (907) 545-4435
Email: amanda@49thstatelaw.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA**

ELIZABETH BAKALAR,

Plaintiff,

vs.

MICHAEL J. DUNLEAVY, in his
individual and official capacities;
TUCKERMAN BABCOCK; and the STATE
OF ALASKA,

Defendants.

Case No. 3:19-cv-00025 JWS

STIPULATION FOR 90 DAY EXTENSION OF PRE-TRIAL DEADLINES

The parties have been working towards narrowing issues that the court needs to decide in this matter. Depositions needed by the defense have been delayed because

STIPULATION FOR 90 DAY EXTENSION OF PRE-TRIAL
DEADLINES

Bakalar v. Dunleavy, et al. Case No. 3:19-cv-00025 JWS

Page 1 of 2

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plaintiff's counsel, Mark Choate, had a medical emergency arise that required cardiac surgery in late May and limited work for a period of time after that. Those depositions need to be completed and the parties want to continue to work on identify issues that will need to be decided by motion practice. The parties request the court extend the following remaining pre-trial deadlines:

Deadline completion of discovery	November 14, 2022
Discovery Motions Deadline	December 9, 2022
Dispositive Motions re damages	December 9, 2022
Motions in Limine	January 9, 2023
Dated: August 12, 2022	CHOATE LAW FIRM LLC Attorneys for Plaintiff

/s/ Mark Choate

By: Mark Choate, 8011070

Dated: August 12, 2022	LANE POWELL LLC Attorneys for Defendant
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/s/ Brewster H. Jamieson

By: Brewster H. Jamieson, #8411122

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Page 2 of 2

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